

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:

Robert Joseph Woods, Jr.,

CHAPTER 13

Debtor

CASE NO. 15-12063

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**DEFENDANT, ROBERT JOSEPH WOODS, JR.'S, RESPONSE TO  
MOTION FOR RELIEF FROM STAY AUTOMATIC STAY PURSUANT TO §362(d)**

AND NOW comes Debtor, Robert Joseph Woods, Jr., by and through his counsel, Charles Laputka, Esq., and files the following Response to Motion for Relief from Automatic Stay Pursuant to §362(d), and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtor's intention is to amend his Chapter 13 Plan to pay the nondischargeable portion of Movant's debt as a specially classified priority claim.
6. Admitted.
7. Denied.
8. Denied. See Debtor's response to paragraph 5 above.
9. Admitted.
10. Denied. Debtor takes no position in regard to this request.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny Movant's Motion.

Date: 3/2/18

By: /s/ Charles Laputka  
Charles Laputka, Esquire  
Attorney for Debtor  
Atty. I.D. No: 091984  
1344 W. Hamilton Street  
Allentown PA 18102  
(610) 477-0155

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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Response to Plaintiff's Motion for Relief was served upon the following individuals via ECF or first-class United States mail, postage prepaid, this 2nd day of March, 2018:

Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

Frederick L. Reigle, Esquire  
2901 Saint Lawrence Avenue  
Reading, PA 19606

Everett Cook, Esquire  
2309 MacArthur Road  
Whitehall PA 18052

By: /s/ Charles Laputka  
Charles Laputka, Esquire  
Attorney for Debtor  
Atty. I.D. No: 091984  
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